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Canyon Fuel
Company, LLC.
Sufco Mine

A Subsidiary of Arch Western Bituminous Group, LLC.

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NOV 21 2005
DIV. OF OIL, GAS & MINING

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November 16, 2005

Mr. Jeff Studenka
Department of Environmental Quality
Division of Water Quality
288 North 1460 West
P. O. Box 144870
Salt Lake City, UT 84114-4870

RE: UPDES Permit No. UT0022918 - Sufco Mine

Dear Mr. Studenka:

Jeffery
11/21/05
Copy Steve F
and Wayne H
and Pete H.

On October 19, 2005 staff from the Division of Water Quality (DWQ), Division of Oil, Gas & Mining (DOGM) and Sufco Mine (Sufco) met to discuss reports of black water in Quitchupah Creek downstream from Outfall 003A. Initially, Sufco presented the layout of the entire mine water distribution system to both you and Steve Fluke (DOGM). Following the presentation of the water distribution maps, the group toured the portion of the mine where UPDES discharge point 003 is located as well as one of the sealed areas used as a sump. During the meeting and tour, we discussed at length how our best guesses for the causes of the black water in Quitchupah Creek. The Sufco staff indicated the reservoirs and sumps used to control sediment levels in the discharge water are located behind sealed mined out areas of the mine and Sufco cannot observe what occurs behind these sealed areas. Additionally, the group discussed the observation that nothing was found at the discharge or on the surface that could directly connect UPDES discharge point 003A with the black water in the creek.

Sufco believes if there was a problem with the system where black water was discharged from the mine that it probably came from the 5 North Gob reservoir area. This sump area has been used for many years as a settling area for suspended solids and that perhaps the area has filled with silt over the years. When caving or mine roof spalling occurs in the sealed sump areas, it could stir up the sediment in the bottom of the reservoir area and mix it back in with the water. This reservoir area has an estimated capacity of 2.1 million gallons and with the present 5 North Gob discharge rate of approximately 1.1 million gallons per day the throughput rate would potentially not allow sufficient time for resettling of the fines before the discharge occurred. If the cave were close to the dam seal, the water would flow only a short distance before discharging from the mine.

Sufco's preventative action plan developed at this meeting to address any potential future problems includes:

1. Reduce the flow of water going through the 5 North Gob reservoir area by sending the clean water from the 4 East Gob reservoir area directly to the discharge point and by

utilizing a pipeline to reroute the water from the miner sections back into the larger 4 East Gob reservoir area which has an estimated capacity of 104 million gallons. This will give more time to settle out the suspended solids from the mine water (See attached water system drawing step 1). This project was started immediately after our meeting and should be completed by December 15, 2005.

2. Install two turbidity meters on the 5 North Gob and 4 East Gob reservoir discharge pipes upstream of the weir at Outfall 003 (See attached water system drawing step 2). Turbidity meters were ordered and are scheduled to be shipped to Sufco on November 15, 2005 and will be installed by December 15, 2005. These two turbidity meters will be connected to the Sufco mine monitoring alarm system to notify mine personnel if there is a problem with the discharge system.
3. Sufco will continue to perform daily visual checks of the mine discharge water until the turbidity meters have been installed and are hooked up to the Sufco monitoring alarm system (See attached Quitchupah mine water discharge examination sheet).

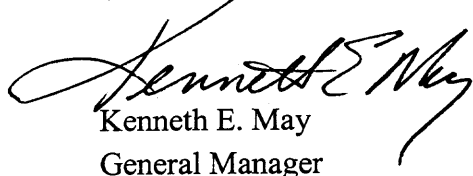
The results of the Sufco water sampling for suspended solids (TSS) received from the lab are presented in the attached summary sheet. It is noteworthy that the TSS concentration results in the UPDES 003A samples have all been 7 mg/L or less. However, the samples taken from Quitchupah creek on the same day as those collected from UPDES point 003A have ranged from 17 to 44 mg/L and are very similar to TSS concentration in samples obtained in the Water Hollow tributary.

If you have any questions or need additional information, please contact Mike Davis at (435) 286-4421.

Sincerely,

CANYON FUEL COMPANY, LLC

SUFSCO Mine

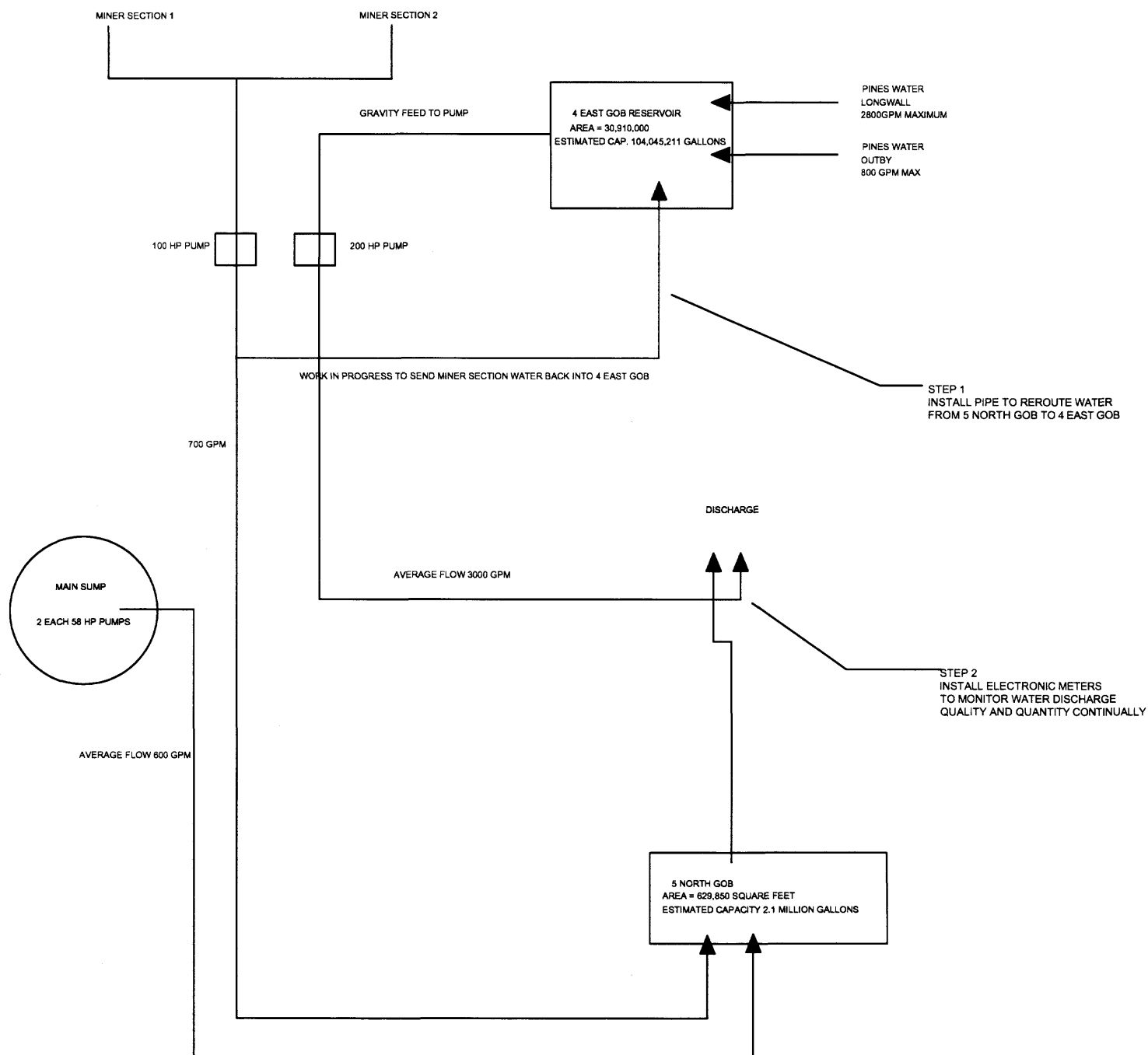


Kenneth E. May
General Manager

Encl.

KEM/MLD:kb

cc: Steve Fluke, DOGM
Chris Hansen, AWBG



Quitcupah Mine Water Discharge Examination

Date	Time	Initials	Does the sample appear to be clear	Comments
10/20/05	8:00 AM	KDM	Yes	None
10/21/05	8:37 AM	EGS	Yes	None
10/21/05	10:00 AM	KDM	Yes	None
10/22/05	8:15 AM	DL-S	Yes	None
10/23/05	8:14 AM	DL-S	Yes	None
10/24/05	2:55 PM	PC	Yes	None
10/25/05	12:20 PM	KDM	fairly clear	None
10/27/05	1505	MRC	Yes	None - sample taken
10/28/05	1226	SH	Yes	None
10/29/05	506 AM	KDM	Yes	None
10/30/05	1201 AM	KDM	Yes	None
10/31/05	1433	MLD	Yes	None - sample taken
11/01/05	2021	SH	Yes	None - sample taken
11/2/05	6:00 PM	KDM	Yes	None Very Clear
11/3/05	8:20 PM	KDM	Yes	None (Clear?)
11/4/05	7:00 PM	FLP	Yes	Clear
11/5/05	7:15 PM	FLP	Yes	Clear
11/7/05	12:00 PM	FLP	Yes	Clear
11/8/05	11:30 AM	FLP	Yes	Clear
11/9/05	3:00 AM	FLP	Yes	None
11/10/05	12:01 AM	FLP	Yes	Clear

Sufco Water Sampling Data

Site	Date	Field pH S.U.	Lab pH S.U.	TDS mg/l	TSS mg/l	Flow gpm	Turb NTU
Quit. Above Discharge	10/18/05			1924	<5		
UPDES 003A	08/03/05	6.74		714	<5	3461	
	08/23/05	6.85		578	<5	1923	
	09/14/05	6.68		730	<5	3321	
	09/28/05	6.67		720	<5	3321	
	10/05/05	6.65		711	<5	2528	
	10/18/05	6.69		751	5	2403	
	10/19/05		7.18	718	<5		
	10/25/05		7.16	719	5		12.5
	10/27/05	6.64	7.09	742	<5		2.5
	10/31/05	6.7		671	7	2403	5.2
	11/02/05	6.6		668	5	3321	5.5
24" Pipe (4 East Gob)	08/03/05			653	<5		
	10/18/05			696	<5		
	10/25/05		7.19	702	5		11.0
	10/27/05	6.61	7.07	721	<5		3.7
	10/31/05	6.85		671	6		5.1
	11/02/05	6.72		650	6		8.0
5N Sump	10/25/05		7.27	749	<5		
	10/27/05	6.73	7.18	765	<5		1.3
Quit. Below Discharge	10/18/05			437	<5		
NF Quit. Upstream Conf.	10/18/05			613	14		
NF Quit. Above Confluence	10/18/05			637	17		
	10/25/05		8.15	614	43		
	10/27/05	7.79	8.19	641	44		23.5
	11/01/05	7.92	8.18	595	67		51.5
Water Hollow Tributary	10/18/05			661	33		
Conf. below Water Hollow	10/18/05			641	12		
Quitcupah @ Highway	10/18/05			797	36		

Sufco Water Sampling Data

Site	Date	Field	Lab	TDS mg/l	TSS mg/l	Flow gpm	Turb NTU
		pH S.U.	pH S.U.				
xc259 Gravity feed	10/25/05		6.9	979	<5		
xc259 West ShortTank	10/25/05		7.21	703	<5		
xc265 H-P Pump	10/25/05		7.47	699	<5		8.2